

**UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA**  
Alexandria Division

|                                  |   |  |
|----------------------------------|---|--|
| <b>UNITED STATES OF AMERICA,</b> | : |  |
|                                  | : |  |
| <b>v.</b>                        | : | <b>Criminal Case No. 1:18-CR-457 (AJT)</b> |
|                                  | : |  |
| <b>BIJAN RAFIEKIAN, et al.</b>   | : |  |

**DEFENDANT BIJAN RAFIEKIAN’S MOTION TO COMPEL DISCLOSURE OF  
CLASSIFIED MATERIAL AND EX PARTE STATEMENT AND FOR AN EXTENSION  
OF TIME TO FILE REPLY IN SUPPORT OF RAFIEKIAN’S MOTION FOR A NEW  
TRIAL**

Defendant Bijan Rafiekian, through counsel, respectfully requests that the Court order the government to disclose the classified information for which DX66 is a purported substitute, as well as the government’s *ex parte* statement in support of its Opposition to Defendant’s Renewed Motion for a New Trial. Mr. Rafiekian also requests a thirty (30) day extension to file his reply in support of his Renewed Motion for New Trial. The grounds for this motion are set forth in the accompanying memorandum of law.

Dated: August 20, 2021

Respectfully submitted,

/s/  
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**CERTIFICATE OF SERVICE**

I hereby certify that, on the 20th day of August 2021, true and genuine copies of Defendant Bijan Rafiekian's Motion to Compel Disclosure of Classified Material and *Ex Parte* Statement and for an Extension of Time to File Reply in Support of Rafiekian's Renewed Motion for a New Trial was sent via electronic mail by the Court's CM/ECF system to the following:

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